

# EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
No. 7:23-CV-897

IN RE: )  
 )  
CAMP LEJEUNE WATER LITIGATION )  
 )  
This Document Relates to: )  
ALL CASES )  
\_\_\_\_\_ )

**PLAINTIFFS' NOTICE OF RULE 30(b)(1) INDIVIDUAL DEPOSITION NOTICE**  
**DE BENE ESSE**

TO: Defendant United States of America  
c/o Adam Bain, U.S. Department of Justice  
P.O. Box 340, Ben Franklin Station  
Washington, D.C. 20044

**PLEASE TAKE NOTICE** that pursuant to Federal Rules of Civil Procedure 30(b)(1) and 26, the stenographic and video-recorded *de bene esse* deposition of the following witness will be taken as set forth below, and thereafter by adjournment until the same shall be completed:

**WITNESS:** Dennis Portier  
**DATE and TIME:** May 28, 2024 at a time to be determined.  
**LOCATION:** Domodossola, Italy at a location to be determined.  
**MANNER OF TAKING:** In-Person

This deposition will be taken before an officer authorized by law to take depositions and will continue from day to day until completed. The deposition will be recorded via stenographic transcription and videotape for purposes of discovery and use at trial.

Deponent(s) who are parties, are required by this notice to be present for their depositions. The deponent agreed to appear in person.

You are invited to attend and take such part as is fit and proper.

Respectfully submitted this 10th day of May 2024.

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)  
Bell Legal Group, LLC  
219 Ridge St.  
Georgetown, SC 29440  
Telephone: (843) 546-2408  
[jeb@belllegalgroup.com](mailto:jeb@belllegalgroup.com)

*Lead Counsel for Plaintiffs*

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser (admitted *pro hac vice*)  
Lieff Cabraser Heimann & Bernstein, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Telephone: (415) 956-1000  
[ecabraser@lchb.com](mailto:ecabraser@lchb.com)

*Co-Lead Counsel for Plaintiffs*

/s/ Robin L. Greenwald

Robin L. Greenwald (admitted *pro hac vice*)  
Weitz & Luxenberg, P.C.  
700 Broadway  
New York, NY 10003  
Telephone: 212-558-5802  
[rgreenwald@weitzlux.com](mailto:rgreenwald@weitzlux.com)

*Co-Lead Counsel for Plaintiffs*

/s/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)  
Wallace & Graham, P.A.  
525 North Main Street  
Salisbury, North Carolina 28144  
Tel: 704-633-5244  
[mwallace@wallacegraham.com](mailto:mwallace@wallacegraham.com)

*Co-Lead Counsel for Plaintiffs*

/s/ Zina Bash

Zina Bash (admitted *pro hac vice*)  
Keller Postman LLC  
111 Congress Avenue, Suite 500  
Austin, TX 78701  
Telephone: 956-345-9462  
[zina.bash@kellerpostman.com](mailto:zina.bash@kellerpostman.com)

*Co-Lead Counsel for Plaintiffs and  
Government Liaison Counsel*

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790)  
The Dowling Firm PLLC  
Post Office Box 27843  
Raleigh, North Carolina 27611  
Telephone: (919) 529-3351  
[mike@dowlingfirm.com](mailto:mike@dowlingfirm.com)

*Co-Lead Counsel for Plaintiffs*

/s/ James A. Roberts, III

James A. Roberts, III (N.C. Bar No.:  
10495)  
Lewis & Roberts, PLLC  
3700 Glenwood Avenue, Suite 410  
P. O. Box 17529  
Raleigh, NC 27619-7529  
Telephone: (919) 981-0191  
[jar@lewis-roberts.com](mailto:jar@lewis-roberts.com)

*Co-Lead Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Notice of Videotaped Deposition to General Anthony Zinni was sent to Counsel for Defendant on the 10th day of May 2024, by electronic mail at the following electronic mail address: adam.bain@usdoj.gov.

/s/ J. Edward Bell, III

J. Edward Bell, III

*Lead Counsel for Plaintiffs*